

WILMERHALE

March 7, 2017

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The Hon. Nelva Gonzales Ramos
Judge, U.S. District Court for the Southern District of Texas
1133 N. Shoreline Blvd.
Corpus Christi, TX 78401

Re: *Veasey, et al. v. Abbott, et al.*, No. 13-000193 (Docketed June 26, 2016)

Judge Ramos:

I am co-counsel with the NAACP Legal Defense Fund for Imani Clark in the above captioned action, *Veasey, et al. v. Abbott, et al.* (the “*Veasey* Litigation”).

Cadene Russell, a former law clerk to the Honorable Carl E. Stewart (5th Cir.), joined Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”) on September 28, 2016, as an Associate in the firm’s Washington, D.C. office. Ms. Russell is a member of the Virginia State Bar, and has applied for admission to the District of Columbia Bar. During her clerkship, Ms. Russell worked on the *Veasey* Litigation.

Rule 1.12 of the Virginia Rules of Professional Conduct and Rule 1.12 of the D.C. Rules of Professional Conduct bar a former judicial law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and describe notification and screening requirements that must be put in place to ensure that the former judicial law clerk does not share information regarding the matter with others at the firm. I am writing to inform your Honor of WilmerHale’s compliance with those requirements.

1. WilmerHale has taken the following steps to screen Ms. Russell from the *Veasey* Litigation:
 - a. Ms. Russell has not worked on the *Veasey* Litigation since her arrival at WilmerHale.
 - b. All WilmerHale lawyers and employees have been notified that Ms. Russell has been screened from the *Veasey* Litigation, that they should not discuss the *Veasey* Litigation with her, and that she should not have access to any files concerning the *Veasey* Litigation.
 - c. WilmerHale has erected electronic barriers to Ms. Russell’s access to all information in the firm’s computer network regarding the *Veasey* Litigation.


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2. As Ms. Russell is a salaried employee, she will not share in any fees attributable to the firm's work on the *Veasey* Litigation.

If the Court requires any additional information concerning this matter, please let me know, and we will be happy to provide it.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'JEP', written over a horizontal line.

Jonathan E. Paikin

cc: All Counsel of Record